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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
841 Chestnut Building  
Philadelphia, Pennsylvania 19107

DATE: FEB 6 1987

SUBJECT: Selection of Sample Areas at NVF Site

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TO: File

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Purpose

This will serve as a justification for the general areas chosen for PCB sampling by the Field Investigation Team, (FIT).

Background

The purpose of this additional sampling arose from NVF's claim that there may be other PCB sources which contributed to the contamination problem in the Kennett Square area. Given the amount of data that is already available to show that NVF can be held responsible for the PCB contamination of the swale through joint, several and strict liability, EPA feels that it is not necessary to sample all of the areas submitted by NVF at EPA's expense.

Sample Locations

During a recent meeting with NVF, PA DER, and EPA, NVF submitted the attached recommend locations for FIT to sample. In all, there are 29 locations which NVF suggested should be sampled, with the actual number of samples in each area to be determined as necessary. After careful review of their proposed locations, I selected the following areas for sampling by FIT:

<u>Location</u>	<u>Sample Number</u>
Vicinity of PECO substation	1(A,B)
Vicinity of Lumberyard	2(A,B)
Noznesky Junkyard	3(A-G)
Upstream of confluence of swale and unnamed tributary	11(A,B)

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### Justification of Sample Locations

Available data shows levels of PCBs in NVF's outfall 001 and continuing at 100 foot intervals along the swale and the unnamed tributary. The types of PCBs found were confined to Aroclors 1248 and 1254, which NVF has used at one time. Based on this information, I decided that initially we would examine only those areas that tend to be upgradient of the existing data points. The following are exact justification for each sample location. Exact sample locations within each area will be based upon actual field conditions.

#### - Vicinity of PECO substation:

This substation has several transformers at this location. The property is located approximately 200 yards upgradient of the NVF facility. In addition, it sits along a potential path of migration into the drainage swale. The sampling will be performed along the railroad right-of-way and not on PECO property since there is no direct evidence at this time to link the PECO substation with this problem.

#### - Vicinity of Lumberyard:

This lumberyard was the site of a fire in 1982. During that fire a NVF employee allegedly witnessed the transformer outside the lumberyard boil over, however, the Kennett Square Fire Department reports that it took extreme care to prevent the transformer from being affected by the fire and reports that the transformer did not boil over. The lumberyard is located next to the NVF facility. Because this transformer is located along a potential path of migration into the swale sampling will be performed in that path of migration and not on the lumberyard property.

#### - Noznesky Junkyard:

PA DER records show a point source of PCBs on the junkyard property at a concentration of approximately 900 ppm. Because there is documented evidence that there is some PCB contamination on the junkyard property, it should be sampled to determine the extent of such contamination and if any potential for migration exists.

#### - Upstream of confluence of swale and unnamed tributary:

NVF claims to have sample results showing levels of PCBs upstream of the confluence of the swale and the unnamed tributary. This area will be sampled since it is upgradient of a known contaminated area.

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The following locations are proposed for sampling as part of the PCB investigation in Kennett Square. These locations are approximated in Figure 1.

LOCATION	SAMPLE NUMBERS
Vicinity of PE substation	1A, 1B
Vicinity of lumber yard	2A, 2B
Noznesky Junkyard	3A, 3B, 3C, 3D, 3E, 3F, 3G
Vicinity of substation 1	4A
Vicinity of substation 2	5A
Pipe 1 into swale	6A
Pipe 2 into tributary	7A
Outfall from retention pond on South St.	8A
Along the railroad tracks	9A, 9B, 9C
Vicinity of mushroom grower's property	10A, 10B, 10C, 10D
Upstream from confluence of swale and tributary	11A, 11B
Vicinity of Kennett Sewage Treatment Plant	12A
Vicinity of baseball field, near West branch of Red Clay Creek	13A, 13B, 13C

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▲	9/14/83
▲	9/22/83
▲	4/18/84
●	6/5/84
●	9/7/84
●	1/22/85
□	1/14/86
X	2/12/86
■	2/19/86

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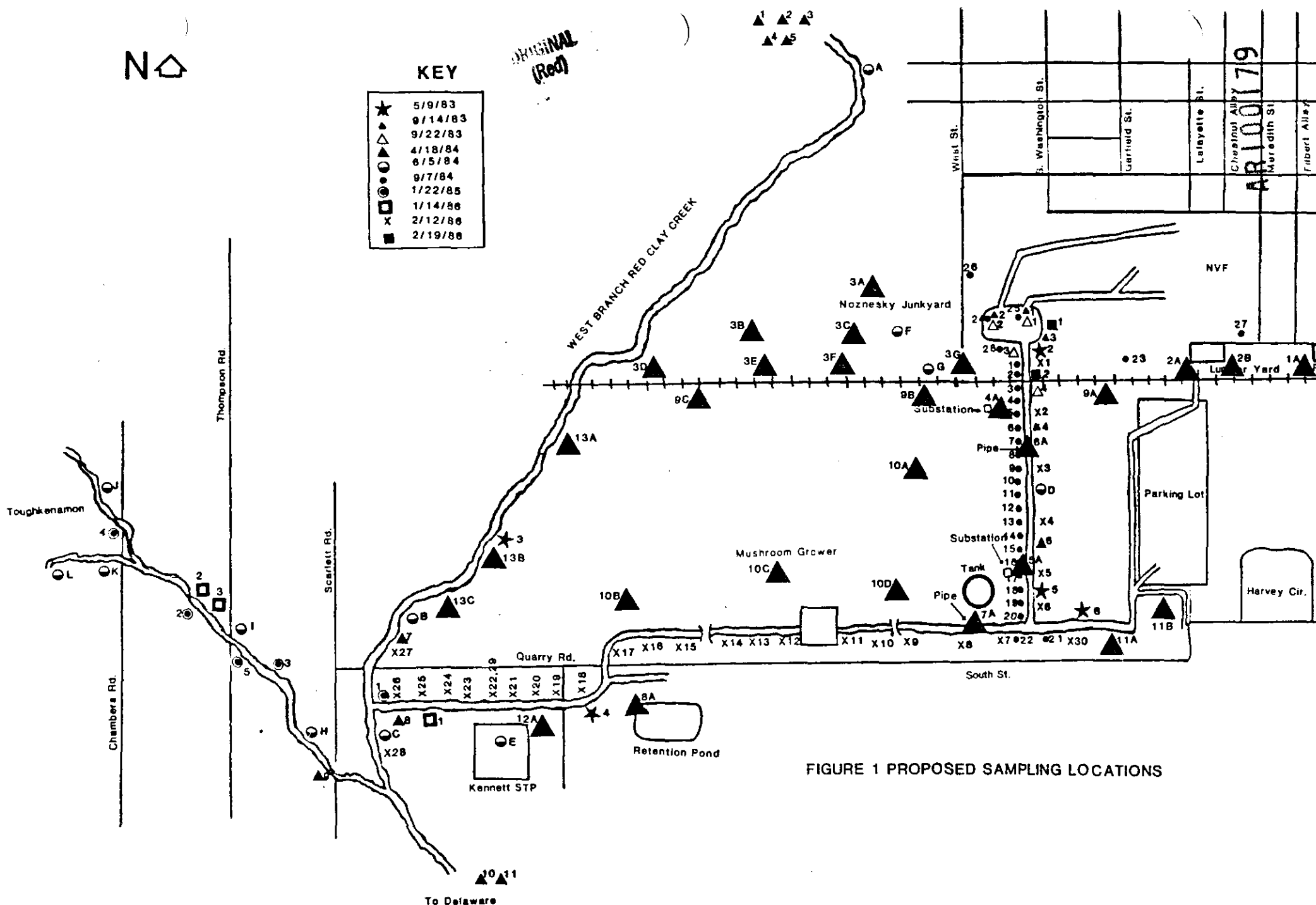


FIGURE 1 PROPOSED SAMPLING LOCATIONS